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October 4, 2022

VIA ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Edelman v. NYU Langone Health System, et al.*
Case No. 1:21-cv-00502 (LGS)(GW)

Dear Judge Schofield:

We are counsel to Defendants and write to respectfully request an extension of time to submit a motion for reconsideration limited to a portion of the Court's Order dated September 28, 2022 (Doc. 155) (the "Order"). In this action, Plaintiff alleges unequal pay in violation of the Equal Pay Act ("EPA") and sex discrimination and retaliation in violation of Title VII of the Civil Rights Act of 1964 ("Title VII"), the New York State Human Rights Law ("NYSHRL") and the New York City Human Rights Law ("NYCHRL"). Defendants moved for summary judgment on all claims (Doc. 108) ("SJ Motion").

Pursuant to the Order, this Court granted in part and denied in part Defendants' SJ Motion. Amongst the claims that survived the motion are claims arising out of an alleged failure to pay equal pay for equal work under EPA. The claims that also remain in the action are the Title VII retaliation claim, the NYCHRL discrimination claims based on allegedly sexist remarks, and the NYCHRL and NYSHRL retaliation claims.

Defendants will be seeking reconsideration of the portions of the Order denying the dismissal of the surviving EPA Claims. The reconsideration motion is due on October 12, 2022, pursuant to Local Civil Rule 6.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York. Given the Jewish high holiday this evening and tomorrow, as well as the federal holiday next week, Defendants respectfully request a one-week extension to and including October 19, 2022, to file their anticipated motion for reconsideration.

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There has been no prior request for an extension of time to file such motion. Plaintiff consents to our request, so long as she has two weeks to respond. In the event the Court directs Plaintiff to submit opposition to our motion pursuant to Your Honor's Motion Rules and Procedures, Defendants have no objection to Plaintiff's request for two weeks to do so.

Respectfully submitted,

TARTER KRINSKY & DROGIN LLP


s/Richard L. Steer

By: _____
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Application GRANTED. Defendants shall file any motion for reconsideration of the Court's order granting in part and denying in part summary judgment by **October 19, 2022**. Plaintiff shall not file any response unless directed to do so by the Court.

Dated: October 4, 2022
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE